

# **EXHIBIT C-1**

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

ECOFACOR, INC.

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:20-cv-00075-ADA

**EXHIBIT C-1: PLAINTIFF ECOFACTOR'S DEPOSITION DESIGNATIONS**

**A. PRELIMINARY STATEMENT AND OBJECTIONS**

Plaintiff EcoFactor, Inc. ("EcoFactor") hereby provides the following deposition designations, which includes objections, and counter-designations provided by Google. By including Google's objections and counter-designations, EcoFactor in no way agrees that Google's objections and/or counter-designations are proper. EcoFactor reserves all rights to dispute or respond to Google's objections and counter-designations. EcoFactor reserves the right to supplement, amend, or modify its deposition designations in connection with outstanding or forthcoming discovery. EcoFactor further reserves its right to offer additional evidence at trial not identified in its deposition designations with respect to claims and defenses for which it does not carry the burden of proof. EcoFactor further reserves its right to offer additional evidence at trial not identified in its deposition designations for purposes of impeachment and rebuttal.

Further, Google has listed a number of witnesses as "will call [live or by depo]" with a footnote stating that they reserve the right to have depo testimony admitted "should the need arise" due to the pandemic. EcoFactor objects to Google's failure to disclose whether

it intends to call the listed witnesses live, or by depo. EcoFactor has provided deposition designations for those witnesses that EcoFactor understands Google will likely not call live, while not providing designations for those witnesses EcoFactor understands Google will likely call live, but reserves all rights to designate deposition testimony for any other witness on Google's witness list that Google identifies it will not call live. To the extent any pandemic-related issues arise for any witnesses that are designated to testify live, the parties can address such issues at that point in time. EcoFactor reserves all rights to designate deposition testimony for any such witness should such a situation arise.

This list of deposition designations includes Google's served objections and counter-designations to EcoFactor's affirmative designations. Google's objection key is included below for reference:

<b>Abbreviations</b>	<b>Deposition Objections</b>
R	Relevance (FRE 401)
LF	Lacks foundation
H	Hearsay (FRE 802)
A	Authentication (FRE 901)
403	Rule 403 (unduly prejudicial/inflammatory/confusing/waste of time/misleading)
P	Privileged
C	Rule of Completeness
404(a)	Rule 404(a) (character evidence)
1006	Rule 1006 (summary of voluminous documents)
OR	Original Required (FRE 1002)
MIL/Daubert	Subject to MIL/Daubert
LP	Limited Purpose Only (FRE 105)
IER	Inadmissible expert report
UCDR/UCFR	Uncertified domestic or foreign record (FRE 902(11) & 902(12))
32(a)	FRCP 32(a) (does not comply with restrictions on use of depo testimony)
PK	Personal knowledge (FRE 602)
DO	Subject to objection to form of deposition question

701	Opinion testimony by lay witness (FRE 701)
30(b)(6)	Outside the scope of the 30(b)(6) topics

## **B. DEPOSITION DESIGNATIONS**

EcoFactor incorporates by reference the Preliminary Statement and Objections as if set forth fully herein. EcoFactor further reserves the right to designate and present any deposition testimony that Google designates in its deposition designations. EcoFactor further reserves the right to designate and present any deposition testimony that contradicts, impeaches, explains, or in any way responds to any deposition testimony that Google designates in its deposition designations. EcoFactor further reserves the right to designate and present deposition testimony for purposes of rebuttal and impeachment. Subject to and without waiving the foregoing rights and objections, EcoFactor provides the following preliminary deposition designations:

**RAMYA BHAGAVATULA, PH.D.**

**GOOGLE, LLC 30(b)(6) Deposition Transcript**

**Dated: Wednesday, September 17, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
7:15	7:16			
8:6	8:17	DO, 30(b)(6)		
10:19	10:22	DO, C	10:8-10:11	
11:9	11:19			
12:22	13:8	DO, 403		
13:17	14:16	DO, 403, C, 30(b)(6)	14:17-15:2	
15:3	15:22	403		

16:1	17:6	403, C	17:8-17:16, 17:24-18:9, 18:19-18:21	
19:1	19:25	403		
20:6	20:13	403		
20:16	20:22	403		
21:1	21:2	403, DO, LF		
21:5	22:1	403, PK		
22:21	23:8	403, DC		
23:9	24:2	403, DO, LF		
24:5	24:5	403, DO, LF		
26:9	26:11	403, R, DO, PK, 30(b)(6)		
26:14	26:18	403, R, DO, PK, 30(b)(6)		
26:21	26:22	R, 403, DO, 30(b)(6)		
27:2	27:3	R, 403, DO, PK, 30(b)(6)		
27:6	27:6	R, 403, DO, PK, 30(b)(6)		
27:11	27:25	403		
28:6	28:11	403, DO, PK		
28:22	29:1	403		
29:6	29:23	403, DO, PK, 30(b)(6)		
30:1	30:6	R, 403, DO, PK, 30(b)(6)		
30:9	31:9	R, 403, DO, PK, 30(b)(6)		
31:13	31:17	403, DO, PK, 30(b)(6)		
31:21	32:2	R, 403, DO, PK, 30(b)(6)		
32:5	32:13	R, 403, DO, LF, PK, 30(b)(6)		
32:16	34:21	R, 403		
37:15	38:1	R, 403		
38:13	38:16	R, 403, DO, LF		
38:19	39:3	R, 403, DO, LF, PK, 30(b)(6)		
39:6	39:25	R, 403, DO, 30(b)(6)		
40:3	40:3	R, 403, PK		
40:5	40:6	R, 403, DO, LF		

40:9	40:17	R, 403, DO, LF		
40:21	44:25	R, 403, DO, LF		
45:2	46:8	R, 403, DO, LF		
46:11	46:15	R, 403, DO, LF		
50:8	50:16	R, 403, C	55:9-55:24, 57:3-57:10	
51:4	51:10	R, 403		
54:6	54:13	R, 403		
63:4	63:11	R, 403		
63:17	64:4	R, 403		
64:7	64:8	R, 403, DO, LF, 30(b)(6)		
64:12	65:23	R, 403, DO, PK, 30(b)(6)		
66:3	66:8	403, DO, LF, PK, C, 30(b)(6)	66:9-66:9	
66:23	66:23	403, DO, LF, PK, 30(b)(6)		
67:10	68:1	403, DO, LF, PK, C, 30(b)(6)	68:2-68:5	
70:15	70:17	R, 403, DO, 30(b)(6)		
70:20	74:7	R, 403, DO, LF, 30(b)(6)		
74:10	74:17	R, 403, DO, LF, 30(b)(6)		
74:20	75:10	403, DO, LF, 30(b)(6)		
75:13	76:2	403, DO, LF, 30(b)(6)		
77:13	77:22	R, 403		
80:2	81:8	R, 403		
84:4	86:7	R, 403		
86:22	87:21	R, 403		
88:1	89:9	R, 403, C	89:10-89:25	
90:21	91:5	R, 403		
97:9	99:3	R, 403, DO, LF		
100:10	104:6	R, 403		
106:2	106:23	R, 403, PK		
107:14	109:5	R, 403, OR		
109:14	110:1	R, 403, OR, P		
110:7	110:10	R, 403, DO, C	110:13-110:16, 110:23-110:25	
111:1	111:10	R, 403, DO, PK		
111:13	112:18	R, 403, DO, PK		

113:1	115:15	R, 403, PK		
117:8	117:22	R, 403, PK		
117:25	120:5	R, 403, DO		
120:9	120:5	R, 403, DO, PK		
120:9	120:10	R, 403, DO, PK		
121:12	123:10	R, 403		
123:20	124:24	R, 403, C	125:12-125:17	

**JOSH BUFFUM****GOOGLE, LLC 30(b)(6) Deposition Transcript****Dated: Friday, September 24, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
8:6	8:7		12:13-12:18	
9:9	9:11		13:2-13:7	
9:17	9:20		13:14-13:20	
10:4	10:5		13:21-14:15	
10:13	10:18		16:6-16:12	
11:3	12:12	C, DO, 403	17:9-17:16	
12:19	13:1	C	17:16-17:17	
14:16	15:10	C	17:25-18:5	
16:13	17:6	C, DO, 403	19:3-19:7	
17:18	17:24	C	21:22-21:25	
18:20	19:2	C, 403	23:19-23:21	
19:8	20:18	C	24:3-24:5	
20:25	21:10	C, DO, 403, R	24:6-25:5	
22:6	22:25	C, R, 403	25:6-25:6	
23:6	23:17	C	25:17-26:1	
23:22	24:2	C, DO	26:8-26:18	
25:7	25:16	C, DO	27:1-27:4	
26:2	26:7	C	27:8-27:17	
26:19	26:23	C, 403	29:16-29:18	
27:5	27:7	C, 403, R	32:24-33:7	
27:18	28:10	C, DO,	33:21-34:3	
28:21	29:6	C	34:10-34:13	
29:19	31:15	C, DO, A	44:14-44:24	
32:3	32:23	C, A	46:17-46:22	
33:8	33:20	C, A, 403	53:10-53:21	
34:4	34:9	C, 403	68:4-68:25	
34:14	34:16	C, 403		
40:15	41:13	C, A, 1006		
42:18	44:13	C, A, 1006, 403, DO		
45:5	46:16	C, A, 1006, 403, DO		
46:23	47:20	C, A, 1006, 403		



48:2	49:4	C, A, 1006, 403, DO		
51:6	53:9	C, R, 403, DO, 701		
55:6	57:2	C, 403, DO, A		
57:7	57:18	C		
69:1	72:9	C		
76:5	79:9	C		

**RUCHI DESAI****Individual & Google LLC 30(b)(6) Deposition Transcript****Dated: Wednesday, August 11, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
39:	40:10	R, DO		
41:6	41:18	C	40:18-40:22	
43:3	45:9	R		
46:6	47:15	R, DO		
126:5	126:25	PK, LF		
128:1	128:25	C, R, OR		
138:19	144:14	R, F, PK, DO, C, OR	144:15-144:20	
144:21	146:17	R, F, PK, OR		
147:20	150:11	R, F, PK, OR		
172:11	174:2	R		
176:16	178:6	R, F, PK		
178:19	178:25	OR, Argumentative (611a)		
179:21	193:17	H, R, DO, PK, F, C	193:18-193:18	

**JEFF GLEESON****Deposition Transcript****Dated: Tuesday, May 19, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
15:14	15:24	C	15:25-16:11	
17:3	17:5		18:19-18:24	
17:16	18:6		29:19-30:13	
18:24	19:20	C	30:22-30:23	
28:11	28:20		31:1-31:2	
326:14	326:17	403	31:8-32:3	
327:9	327:18	C, 403	33:2-33:9	403, MIL/Daubert
330:11	330:23	R, DO, 403	33:12-34:4	403, MIL/Daubert
331:1	332:22	R, 403	34:8-34:10	403, MIL/Daubert
333:4	333:18	R, DO, 403	327:19-327:25	403
333:22	334:12	R, 403, C	334:15-334:16	403
337:18	339:9	R, 403, OR, DO	334:20-334:21	403
339:13	339:22	R, 403	334:25-336:2	403

**SCOTT HUBLOU****Deposition Transcript****Dated: Tuesday, August 10, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
9:8	9:13			
16:8	16:14	R, 403		
17:19	18:3			
30:9	32:14	R, 403		
33:10	33:25	R, 403		
38:2	38:22	R, 403, 701, OR		
40:13	43:3	R, 403, 701, OR, C	43:5-43:6	
43:7	43:13	R, 403, 701, OR		
43:25	44:13	R, 403, 701, OR		
45:19	46:16	R, 403, 701, C	45:13-45:18	
47:2	47:22	R, 403, 701, C	46:17-46:20	
48:6	49:14	R, 403, 701, OR		
52:24	53:18	R, 403, 701		
55:3	56:5	R		
56:18	57:24	R, C		
58:24	59:17	R		
59:24	60:10	R, C	59:18-59:23	
60:15	62:8	R, LF, 701		
64:14	65:7	R		
65:16	65:25	R, LF, 701		
66:10	67:7	R		
69:12	70:8	R		
72:6	73:1	R, DO		
75:4	75:14	R		
77:5	78:11	R, DO, LF		
82:21	83:8	R, 403		
83:18	86:19	R, 701		
87:5	90:16	R, C, 403	86:21-87:1	DO
90:20	92:24	R, DO, 701		
93:4	94:3	R, 403, 701		
113:22	114:12	R		
119:12	119:24	R, C	118:19-119:11	
128:11	130:17	R	126:23-127:19	403, 701

132:3	133:16	R		
134:25	135:25	R, C, 701		
136:17	137:8	C	136:1-136:16	403, 701
139:11	140:10	R		
141:8	141:21	C	140:22-141:1	DO
143:6	143:12	R, 403		
144:4	144:15	R, 403, 701		
144:22	148:15	R, 403, 701		
148:24	152:23	R, 403, 702		
153:7	153:9	R		
154:19	158:4	R, DO, LF, PK, 701		
158:9	162:16	R, 701, 403, DO, H, LF, PK		
162:20	163:1	R, LF		
163:8	174:22	R, LF, PK, H, 403, DO		
175:14	177:25	R, C, DO, 701	174:24-175:13	
178:2	180:25	R, C, 403, H, D0	178:1-178:1	
181:2	181:15	R, 403		
182:11	183:15	R, 701, 403		
183:24	186:24	R, 701, 403		
187:10	199:10	R, LF, 403, 701, MIL/Daubert		

**DIA KHARRAT**  
**Google LLC 30(b)(6) Deposition Transcript**  
**Dated: Monday, August 30, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
7:12	8:3	R, 403		
8:13	9:18	R, 403, C	9:19-9:23	
10:3	10:13	403, C		
11:2	11:12	403, C, DO	10:23-10:25	
11:14	11:14	403, DO		
12:22	13:10	R, 403, C, DO	13:11-13:14, 13:16-13:17	
14:12	14:20	403, DO		
14:22	15:11	403, DO		
15:13	15:19	403, DO		
15:21	15:22	403, DO		
16:8	16:17	403		
16:24	17:1	403, DO, LF		
17:3	17:6	403, DO, LF		
17:8	17:23	403, DO		
17:25	18:6	403, DO		
18:8	18:12	403, C, DO, LF	18:13-18:16, 18:18-18:19	
19:4	19:15	403		
20:15	20:16	403, DO		
20:18	20:22	403, DO		
21:7	21:13	403		
21:16	21:19	403		
22:24	23:2	403, DO		
23:4	23:9	403, DO		
23:12	23:14	403, DO, 30(b)(6)		
23:17	23:22	403, DO, PK, 30(b)(6)		
23:25	24:8	403, DO, PK, 30(b)(6)		
24:10	24:22	403, DO		
25:7	25:25	LR, 403		
26:1	26:11	LR, 403, DO		
26:13	26:15	LR, 403, DO		

26:18	26:21	LR, 403, DO		
27:3	27:6	LR, 403, DO		
28:1	28:8	403		
28:21	28:23	403, DO, C, PK, 30(b)(6)	28:17-28:20	
28:25	29:5	403, DO, PK, 30(b)(6)		
29:7	29:7	403, DO, PK, C, 30(b)(6)	29:8-29:8	
29:25	30:1	403, DO, PK, C, 30(b)(6)	29:20-29:21, 29:23-29:23	
30:3	30:5	403, DO, PK, C, 30(b)(6)	30:7-30:7, 30:9- 30:10	
30:23	32:3	403, DO		
32:5	32:12	403, DO		
32:24	32:25	403, DO		
33:2	33:16	403, DO		
33:18	33:19	403, DO		
33:21	34:5	403, DO, 30(b)(6)		
34:8	34:13	403, DO, 30(b)(6)		
34:15	35:8	403, DO, 30(b)(6)		
35:11	35:22	403, DO, 30(b)(6)		
35:25	36:10	403, DO, PK, 30(b)(6)		
36:12	36:21	403, DO		
36:23	37:4	403, DO		
37:10	37:15	403, DO, C, PK	37:9-37:9	
38:20	38:21	LR, 403, DO, PK, 30(b)(6)		
38:24	39:4	LR, 403, DO, PK, C, 30(b)(6)	39:7-39:8	
39:15	39:17	LR, 403, DO, PK		
39:19	39:25	LR, 403, DO, PK, 30(b)(6)		
40:3	40:23	LR, 403, DO, PK, 30(b)(6)		
40:25	41:9	LR, 403, DO, PK		
41:12	41:12	LR, 403, DO		

41:15	42:1	403, C	42:2-42:6, 42:8-42:13	
42:14	42:17	403, DO		
42:19	43:3	403, DO		
43:5	43:22	403, DO		
43:24	43:25	403, DO		
44:2	44:3	403, DO		
44:5	44:12	403, DO		
44:14	44:23	403, DO		
45:4	45:14	403, DO		
45:16	45:25	403, DO, PK, 30(b)(6)		
46:3	46:7	403, DO, PK, 30(b)(6)		
46:9	46:10	403, DO, PK, 30(b)(6)		
47:11	47:13	403, DO		
47:11	47:13	403, DO		
47:15	47:16	403, DO		
49:7	49:8	403, DO, 30(b)(6)		
49:11	49:17	R, 403, DO, 30(b)(6)		
49:19	49:23	R, 403, DO, 30(b)(6)		
49:25	50:1	R, 403, DO, 30(b)(6)		
50:19	50:21	R, 403, DO, 30(b)(6)		
50:23	51:6	R, 403, DO, 30(b)(6)		
51:8	51:14	403, DO, PK, 30(b)(6)		
51:16	51:20	R, 403, DO, PK, 30(b)(6)		
51:23	52:4	403, DO, PK, 30(b)(6)		
52:7	52:21	403, DO, PK, 30(b)(6)		
52:24	53:2	403, DO, PK, 30(b)(6)		
53:5	53:8	403, DO, PK, 30(b)(6)		
53:10	53:17	403, DO, PK, 30(b)(6)		



53:20	54:1	403, DO, PK, 30(b)(6)		
54:4	54:10	403, DO, PK, 30(b)(6)		
54:12	54:15	403, DO, PK, 30(b)(6)		
54:18	54:23	403, DO, PK, 30(b)(6)		
55:1	55:4	403, DO, PK, 30(b)(6)		
55:7	55:19	403, DO, PK, 30(b)(6)		
55:22	55:25	403, DO, PK, 30(b)(6)		
56:2	56:4	403, DO, PK, 30(b)(6)		
56:6	56:7	403, DO, PK, 30(b)(6)		
57:25	58:1	403, DO, 30(b)(6)		
58:3	58:9	R, 403		
59:2	59:4	R, 403, DO, 30(b)(6)		
59:6	59:13	R, 403, DO, 30(b)(6)		
60:10	61:12	403, DO, PK, 30(b)(6)		
61:15	62:3	403, DO, 30(b)(6)		
62:5	62:16	403		
63:5	63:6	R, 403, C	62:19-62:20, 62:22-62:24, 63:2-63:3	
63:8	63:9	403, DO, PK		
63:19	63:22	403, DO, PK, 30(b)(6)		
63:25	64:7	403, DO, PK, 30(b)(6)		
64:9	64:9	403, DO, 30(b)(6)		
64:13	64:14	403, DO		
64:16	64:16	403, DO		
64:25	65:16	DO		
65:18	65:23	DO		
65:25	66:1	DO		

66:3	66:20	403		
67:2	67:9	403, DO		
67:11	67:15	403, DO		
67:17	67:8	403, C		
68:22	69:3	403		
69:22	70:14	403		
70:20	71:11	403, DO		
71:13	71:22	403, C		
73:6	73:14	R, 403, C	73:16-74:5, 74:7-74:10	
74:12	74:21	403, DO		
74:23	74:11	403, DO		
75:13	75:14	403, DO		
75:19	75:23	403, DO		
75:25	76:23	403, DO		
76:25	77:7	403		
77:18	78:1	403, DO, 30(b)(6)		
78:3	78:6	403, DO, 30(b)(6)		
78:11	78:12	403, DO, PK, 30(b)(6)		
78:15	78:22	403, DO, PK, 30(b)(6)		
78:25	79:4	403, DO, PK, 30(b)(6)		
79:6	79:7	403, DO, PK, 30(b)(6)		
79:18	79:20	403, DO		
79:22	79:25	403, DO		
80:1	80:5	403, DO		
80:7	80:9	403, DO		
80:12	80:16	403, DO		
80:18	81:9	403, DO		
81:11	81:12	403, DO		
81:14	81:18	403, DO		
81:20	82:17	403, DO		
82:19	82:21	403, DO		
82:23	82:25	403		
83:4	83:8	403, DO		
83:10	83:24	403, DO		
84:13	84:17	403, DO, C		
84:19	84:20	403, DO, C	84:22-84:24, 85:1-85:3	
85:5	85:7	403, DO		

85:9	85:16	403, DO		
85:18	85:19	403, DO		
86:4	86:5	403, DO		
86:7	86:11	403, DO, PK, 30(b)(6)		
86:14	86:21	403, DO, PK, 30(b)(6)		
86:23	86:25	403, DO, PK, C, 30(b)(6)	87:2-87:4, 87:6- 87:10, 87:12- 87:17, 87:19- 87:24, 88:2-88:3	
88:5	89:18	403, DO		
89:20	89:22	403, DO		
89:25	90:2	403, DO		
90:4	90:5	403, DO		
90:16	90:20	403, DO		
90:22	91:5	403, DO		
91:7	91:10	403, DO		
91:12	91:16	403, DO, PK, 30(b)(6)		
91:19	91:20	403, DO, PK, 30(b)(6)		
91:22	91:22	403, DO, PK, 30(b)(6)		
92:5	92:8	403, DO, PK, 30(b)(6)		
92:11	92:21	403, DO, 30(b)(6)		
92:23	92:23	403, DO		
92:25	93:2	403, DO, PK, 30(b)(6)		
93:5	93:7	403, DO, PK, 30(b)(6)		
94:8	95:14	DO		
95:16	96:2	403, DO		
96:4	96:14	403, DO		
96:17	96:18	403, DO, PK, 30(b)(6)		
96:21	96:24	403, DO, PK, 30(b)(6)		
97:2	97:8	403, DO, PK, 30(b)(6)		
97:10	97:17	403, DO		
97:19	97:19	403, DO, C	97:21-97:21, 97:23-97:25	

98:2	98:4	403, DO		
98:6	98:23	403, DO		
99:1	99:15	403		
100:4	100:18	403		
100:24	101:11	403, DO, PK, 30(b)(6)		
101:14	101:18	403, DO, PK, 30(b)(6)		
101:21	101:22	403, DO, PK, C, 30(b)(6)	102:1-102:3, 102:6-102:7	
101:24	101:24	403		
102:9	102:10	403, DO, PK, 30(b)(6)		
102:13	102:21	403, DO, PK, 30(b)(6)		
102:24	104:14	403, DO, PK, 30(b)(6)		
104:16	105:23	403, DO, 30(b)(6)		
105:25	106:8	403, DO		
106:10	106:23	403, DO		
106:25	107:6	403, DO		
107:8	107:13	403, DO, PK, 30(b)(6)		
107:16	108:2	403, DO, PK, 30(b)(6)		
108:5	109:6	403, DO, PK, 30(b)(6)		
109:8	109:11	403, DO		
109:22	109:23	403, DO, PK, 30(b)(6)		
110:1	110:5	403, DO, PK, 30(b)(6)		
110:7	110:8	403, DO, PK, 30(b)(6)		
111:1	111:23	403, DO, PK, 30(b)(6)		
112:1	112:17	403, DO, PK, 30(b)(6)		
112:19	113:7	403, DO, PK		
113:9	113:18	403, DO		
113:20	114:2	403, DO		
114:4	114:10	403, DO		
114:12	114:16	403, DO, PK, 30(b)(6)		

114:19	115:18	403, DO, PK, 30(b)(6)		
115:20	115:25	403, DO, PK, 30(b)(6)		
116:3	116:21	403, DO, 30(b)(6)		
117:8	117:9	403, DO, 30(b)(6)		
117:12	117:14	403, DO, 30(b)(6)		
117:17	117:20	403, DO, 30(b)(6)		
117:23	118:3	403, DO, 30(b)(6)		
118:5	118:10	403, DO, PK, 30(b)(6)		
118:13	118:17	403, DO, PK, 30(b)(6)		
118:20	118:24	403, DO, PK, 30(b)(6)		
119:1	119:9	403, DO, 30(b)(6)		
119:11	119:14	403, DO, PK, 30(b)(6)		
119:17	119:18	403, DO, PK, 30(b)(6)		
119:22	119:24	403, DO, PK, 30(b)(6)		
120:2	120:7	403, DO, PK, 30(b)(6)		
120:10	120:14	403, DO, PK, 30(b)(6)		
120:17	120:22	403, DO, PK, 30(b)(6)		
120:24	121:1	403, DO, PK, 30(b)(6)		
121:4	121:8	403, DO, PK, 30(b)(6)		
121:11	121:15	403, DO, PK, 30(b)(6)		
121:17	121:21	403, DO, PK, 30(b)(6)		
121:24	122:5	403, DO, PK, 30(b)(6)		
122:8	122:10	403, DO, PK, 30(b)(6)		



**JAMES MACCOUN****Google LLC 30(b)(6) Deposition Transcript****Dated: Wednesday, August 4, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
11:24	13:6			
66:2	66:9			
66:12	66:25		59:25-63:20; 65:3-65:9; 65:11-65:25	
68:20	69:1			
121:8	122:7			
122:17	124:4	H, R	124:5-124:19; 126:8-126:12; 126:13-128:4	
130:12	130:17		126:8-126:12; 126:13-128:4	
148:12	148:25			
149:21	149:24	DO		
150:2	150:7	DO		
150:9	150:10	DO		
150:12	150:18	DO, 701		
150:22	151:18	DO, 701		
152:20	152:22	DO		
152:24	153:6	DO, 701		
153:9	153:10	DO, 701		
153:23	153:25			

**SCOTT McGARAGHAN****Individual & Google LLC 30(b)(6) Deposition Transcript****Dated: Wednesday, August 24, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
11:20	11:21		12:7-12:11	
12:1	12:5			
12:13	13:8			
27:19	27:25	R	28:1-28:3; 28:5-28:8	
28:10	28:14	R, 403	28:1-28:3; 28:5-28:8	
28:16	28:19	R, 403	29:7-29:15	
28:21	29:3	R, 403	29:7-29:15	
37:22	38:8	R, 403	38:15-38:23	
39:10	39:12	R, 403, PK, DO		
39:17	40:4	R, 403, PK, DO		
40:7	40:17	R, 403, PK, DO		
41:19	42:6		42:7-42:11	
43:7	43:16	R, 403, PK		
44:12	44:13	R, 403, PK		
44:16	46:11	R, 403, PK		
46:14	46:20	R, PK, DO, 30(b)(6)		
47:2	47:8	R, PK, DO, 30(b)(6)		
47:12	47:13	R, PK, DO		
53:25	54:17			
55:4	56:11	R, 403, PK	56:20-56:23	
56:13	56:18	R, 403, PK	56:20-56:23	
57:16	58:15	R, PK, 30(b)(6)	57:8-57:11; 57:13-57:14	
62:2	62:10		62:12-62:19	
62:20	62:22		62:12-62:19	
63:3	63:18	R, 403, PK, OR		
63:20	64:10	R, 403, PK, OR		
64:12	67:1	R, 403	67:2-67:15	403



67:16	67:21	R, 403, H	67:2-67:15; 67:22-68:12; 68:14-68:23; 68:25-69:24; 80:2-80:9	
71:15	71:17	R, 403, H	72:4-72:11	
71:21	72:3	R, 403, H	72:4-72:11	
73:11	74:4	R, 403	76:17-76:25, 77:2-77:4; 77:8- 77:22; 79:8- 79:18; 82:5- 82:6; 82:12- 82:16	403

**MICHAEL MAIGRET**  
**ECOBEE, INC. 30(b)(6) Deposition Transcript**  
**Dated: Wednesday, September 3, 2021**

Original Designation Start	Original Designations End	Objections to Original Designations	Counter Designations	Rebuttal Objections to Counter Designations
21:21	22:7	R, MIL/Daubert		
22:17	23:16	R, MIL/Daubert		
29:19	29:25			
48:22	48:24	R, MIL/Daubert	50:23-51:1, 53:12-55:3	
61:16	62:18	R, MIL/Daubert		
69:6	69:25			

